IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION
MAY 2018 SESSION

CLERK'S OFFI	CE U.S. DIST. COURT DANOKE, VA FILED
	10 2018
JULIA C/D BY: DEPU	WESKUM

UNITED STATES OF AMERICA)	Criminal No. 7:18-CR-000_22
v.	.)	
)	In Violation of: Title 18 U.S.C. §875
TRAYVONE RAYCRON KASEY)	Title 18 U.S.C. §2261A

COUNT ONE

The Grand Jury charges that:

- 1. On or about the 13th day of February, 2018, in the Western Judicial District of Virginia, the defendant, **TRAYVONE RAYCRON KASEY**, knowingly and willfully did transmit in interstate and foreign commerce via cell phone text message a threat to injure the person of another, to wit: the defendant sent a text message threatening to injure T.S. stating, in pertinent part, "I'ma beat tf outta u," which is slang for "I am going to beat the fuck out of you."
 - 2. All in violation of Title 18, United States Code, Section 875(c).

COUNT TWO

The Grand Jury further charges that:

1. On or about the 14th day of February, 2018, in the Western Judicial District of Virginia, the defendant, **TRAYVONE RAYCRON KASEY**, knowingly and willfully did transmit in interstate and foreign commerce via cell phone text message a threat to injure the person of another, to wit: the defendant sent text messages threatening to injure T.S. stating, in pertinent part, "omm ima do something mean & swear to God I don't gaf about the police...tell them I send u this omm im going to do something mean to u," which is slang for, "On my mom, I am going to do something Page 1 of 3

mean and I swear to God I don't give a fuck about the police...tell them I sent you this, on my mom, I'm going to do something mean to you."

2. All in violation of Title 18, United States Code, Section 875(c).

COUNT THREE

The Grand Jury further charges that:

- 1. On or about the 15th day of February, 2018, in the Western Judicial District of Virginia, the defendant, **TRAYVONE RAYCRON KASEY**, knowingly and willfully did transmit in interstate and foreign commerce via cell phone text message a threat to injure the person of another, to wit: the defendant sent text messages threatening to injure T.S. stating, in pertinent part, "I promise ones I catch u I want u to tell me the truth if not I'ma beat tf outta u so many time," which is slang for, "I promise once I catch you I want you to tell me the truth; if not I am going to beat the fuck out of you so many times"; and further stating, in pertinent part, "Really I swear I'ma catch u hope the police don't catch me bf I see you baby fr hope and pray they don't fr," which is slang for, "Really I swear I am going to catch you; hope the police don't catch me before I see you baby for real. Hope and pray they don't, for real."
 - 2. All in violation of Title 18, United States Code, Section 875(c).

COUNT FOUR

The Grand Jury further charges:

1. That between on or about the 12th day of February, 2018, and on or about the 15th day of February, 2018, in the Western Judicial District of Virginia, the defendant, **TRAYVONE RAYCRON KASEY**, with the intent to harass and intimidate, used the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce, to wit: cell phone text messages, to engage in a course of conduct that caused, attempted to cause, and would be reasonably

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expected to cause substantial emotional distress to T.S.

2. All in violation of Title 18, United States Code, Section 2261A(2)(B).

A TRUE BILL, this ______ day of May, 2018.

/s/ Foreperson FOREPERSON

THOMAS T. CULLEN

UNITED STATES ATTORNEY

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